

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

ROW VAUGHN WELLS, INDIVIDUALLY)
AND AS ADMINISTRATRIX OF THE)
ESTATE OF TYRE DEANDRE NICHOLS,)
DECEASED,)

Plaintiffs,)

v.)

CASE NO. 2:23-CV-02224
JURY DEMAND

THE CITY OF MEMPHIS, A MUNICIPALITY;)
CHIEF CERELYN DAVIS, IN HER OFFICIAL)
CAPACITY; EMMITT MARTIN III, IN HIS)
INDIVIDUAL CAPACITY; DEMETRIUS)
HALEY, IN HIS INDIVIDUAL CAPACITY;)
JUSTIN SMITH, IN HIS INDIVIDUAL)
CAPACITY; DESMOND MILL, JR. IN HIS)
INDIVIDUAL CAPACITY; TADARRIUS)
BEAN, IN HIS INDIVIDUAL CAPACITY;)
PRESTON HEMPHILL, IN HIS INDIVIDUAL)
CAPACITY; ROBERT LONG, IN HIS)
INDIVIDUAL CAPACITY; JAMICHAEL)
SANDRIDGE, IN HIS INDIVIDUAL)
CAPACITY; MICHELLE WHITAKER, IN HER)
INDIVIDUAL CAPACITY; DEWAYNE)
SMITH, IN HIS INDIVIDUAL CAPACITY)
AND AS AGENT OF THE CITY OF)
MEMPHIS,)

Defendants.)

**PLAINTIFF ROWVAUGHN WELLS', INDIVIDUALLY AND AS ADMINISTRATRIX AD
LITEM OF THE ESTATE OF TYRE DEANDRE NICHOLS, DECEASED, RESPONSES
TO DEFENDANT CITY OF MEMPHIS' SECOND SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS AND TANGIBLE THINGS**

COMES NOW Plaintiff RowVaughn Wells Individually and as Administratrix Ad Litem
of the Estate of Tyre Deandre Nichols ("Plaintiff"), by and through her attorneys, ROMANUCCI

& BLANDIN, LLC, and propounds the following responses to Defendant City of Memphis' First

Set of Requests for Production of Documents and Tangible Things:

REQUEST NO. 32: Produce copies of all documents and communications reflecting any public records requests made by You or by anyone on Your behalf, pursuant to the Freedom of Information Act or Tennessee's Public Records Act, including the requests identified in Your response to Interrogatory No. 19.

RESPONSE: See Wells_005806 – 005942. These documents contain documents responsive to Request for Production Nos. 32 and 33.

REQUEST NO. 33: Produce copies of all documents, communications, and records received by You in response to or otherwise related to any public records requests made by You or by anyone on Your behalf, pursuant to the Freedom of Information Act or Tennessee's Public Records Act, including the requests identified in Your response to Interrogatory No. 19.

RESPONSE: See Wells_005806 – 005942. These documents contain documents responsive to Request for Production Nos. 32 and 33.

REQUEST NO. 34: Produce copies of all documents, communications, and records that in any way support, reflect, relate to, or concern your claims for damages in this case as prayed for in Paragraphs 871–896 of the Complaint.

RESPONSE: Objection, vague, overly burdensome, and premature at this stage of litigation while discovery and depositions are ongoing. See Wells_000288 – 000294, Medical Bills from St. Francis Hospital, see Body Worn Camera videos at Wells_003072, Wells_003081, Wells_003084, Wells_003085, Wells_003091, Wells_003093; St. Francis Hospital Medical Records at Wells_000295 – 001528; Medical Examiner's Report and Images, at Wells_001529 – 001857; Pictures of Tyre, Wells_003388 – 003401 and Wells_005944 - 005946. Plaintiff is also expending costs, disbursements, and reasonable attorneys' fees under 42 U.S.C. § 1988 which cannot be assessed at this time; and pre-judgment and post-judgment interest that also cannot be assessed at this time. Plaintiff reserves the right to timely supplement this response as additional documents become available to her.

REQUEST NO. 35: Produce copies of all documents, communications, and records related to any child support arrangements for Mr. Nichols' son referenced in Paragraph 41 of the Complaint, including child support payments, formal or informal parenting plans, court orders, garnishment of wages, or child support liens.

RESPONSE: See Wells_005943. Plaintiff does not have additional responsive documents in her possession at this time. Plaintiff reserves the right to timely supplement this response.

Dated: August 22, 2024

Respectfully Submitted,

/s/ Bhavani Raveendran

ROMANUCCI & BLANDIN, LLC

Antonio Romanucci (*pro hac vice*)

(Illinois ARDC No. 6190290)

Bhavani Raveendran (*pro hac vice*)

(Illinois ARDC No. 6309968)

Sarah Raisch (*pro hac vice*)

(Illinois ARDC No. 6305374)

Sam Harton (*pro hac vice*)

321 North Clark St., Suite 900

Chicago, Illinois 60654

Tel: (312) 458-1000

Fax: (312) 458-1004

Email: aromanucci@rblaw.net

Email: b.raveendran@rblaw.net

Email: sraisch@rblaw.net

Email: sharton@rblaw.net

MENDELSON LAW FIRM

David Mendelson

(Tennessee Bar No. 016812)

Benjamin Wachtel

(Tennessee Bar No. 037986)

799 Estate Place

Memphis, Tennessee 38187

Tel: (901) 763-2500 ext. 103

Fax: (901) 763-2525

Email: dm@mendelsonfirm.com

Email: bwachtel@mendelsonfirm.com

BEN CRUMP LAW

Ben Crump (*pro hac vice pending*)

(Washington, D.C. Bar No. 1552623)

(Tennessee Bar No. 038054)

Chris O'Neal (*pro hac vice pending*)

(Florida Bar No. 910201)

Brooke Cluse

(Texas Bar No. 24123034)

717 D Street N.W., Suite 310

Washington, D.C. 20004

Email: ben@bencrump.com

Email: chris@bencrump.com

Email: brooke@bencrump.com

COUNCIL & ASSOCIATES, LLC

Lashonda Council Rogers
(Georgia Bar No. 190276)
50 Hunt Plaza, SE Suite 740
Atlanta, Georgia 30303
Tel: (404) 526-8857
Fax: (404) 478-8423
Email: lr Rogers@thecouncilfirm.com

EARNESTINE HUNT DORSE

Earnestine Hunt Dorse
(Tennessee Bar No. 012126)
3268 N Waynoka Circle
Memphis, Tennessee 38111-3616
Tel: (901) 604-8866
Email: ehdorse@gmail.com

CERTIFICATE OF SERVICE

I, Eva Dickey, hereby certify that on August 22, 2024, I served all Counsel of Record listed on the ECF System for this action via email.

s/ Eva Dickey

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

ROW VAUGHN WELLS, INDIVIDUALLY
AND AS ADMINISTRATRIX OF THE
ESTATE OF TYRE DEANDRE NICHOLS,
DECEASED,

Plaintiffs,

v.

THE CITY OF MEMPHIS, A MUNICIPALITY;
CHIEF CERELYN DAVIS, IN HER OFFICIAL
CAPACITY; EMMITT MARTIN III, IN HIS
INDIVIDUAL CAPACITY; DEMETRIUS
HALEY, IN HIS INDIVIDUAL CAPACITY;
JUSTIN SMITH, IN HIS INDIVIDUAL
CAPACITY; DESMOND MILL, JR. IN HIS
INDIVIDUAL CAPACITY; TADARRIUS
BEAN, IN HIS INDIVIDUAL CAPACITY;
PRESTON HEMPHILL, IN HIS INDIVIDUAL
CAPACITY; ROBERT LONG, IN HIS
INDIVIDUAL CAPACITY; JAMICHAEL
SANDRIDGE, IN HIS INDIVIDUAL
CAPACITY; MICHELLE WHITAKER, IN HER
INDIVIDUAL CAPACITY; DEWAYNE
SMITH, IN HIS INDIVIDUAL CAPACITY
AND AS AGENT OF THE CITY OF
MEMPHIS,

Defendants.

CASE NO. 2:23-CV-02224
JURY DEMAND

**RESPONSES OF PLAINTIFF ROWVAUGHN WELLS, INDIVIDUALLY AND AS
ADMINISTRATRIX AD LITEM OF THE ESTATE OF TYRE DEANDRE NICHOLS,
DECEASED, DEFENDANT CITY OF MEMPHIS' SECOND SET OF
INTERROGATORIES**

COMES NOW Plaintiff RowVaughn Wells Individually and as Administratrix Ad Litem
of the Estate of Tyre Deandre Nichols ("Plaintiff"), by and through her attorneys, ROMANUCCI

& BLANDIN, LLC, and propounds the following responses to Defendant City of Memphis' First Set of Interrogatories:

INTERROGATORY NO. 21: Identify all health care providers of any kind, including, but not limited to, hospitals, clinics, rehabilitation/recovery facilities (whether in-patient or out-patient), doctors, chiropractors, mental health professionals, or other health care providers that You saw in the past ten (10) years, including but not limited to, any individual or provider seen for injuries allegedly related to the subject incident, and provide a brief description of the treatment received from each provider and the approximate dates of treatment.

RESPONSE:

Dr. Charles Hubbert – Psychiatrist

Plaintiff began to see Dr. Hubbert in January 2023, post incident. She began with weekly appointments and later appointments were scheduled every two weeks. In January 2024, Plaintiff returned to work and stopped appointments with Dr. Hubbert, but has recently begun seeing him again.

Dr. Kelly Badura – General Physician at Baptist Family Medical Group

Plaintiff sees Dr. Badura for regular health and women's health checkups. Plaintiff has received no major health diagnoses other than high cholesterol.

INTERROGATORY NO. 22: Please describe in detail the history and nature of Mr. Nichols relationship and Your relationship with members of the Volker family, including, but not limited to, Kris Volker, Lori Volker, Brandon Volker, and Marvin Volker.

RESPONSE: Objection. This Interrogatory exceeds the scope of relevant information to which Defendants are entitled under Federal Rule of Civil Procedure 26, is overly burdensome and vague. Kris Volker, Lori Volker, Brandon Volker, and Marvin Volker are not parties to this litigation or witnesses to the January 7, 2023 incident and Tyre's relationship with the Volkens does not relate to any question of fact at issue in this case. Subject to, and without waiving, said objections, Plaintiff answers as follows:

Tyre and Kris Volker became best friends while they were attending Bowling Green Elementary School in Sacramento, California at age 7 or 8. Tyre and Kris would skateboard together and just generally hang out. Tyre and Kris had a very supportive friendship with each other and Tyre enjoyed going over to the Volker house. Marvin Volker was Kris's father, and Lori Volker was Kris's stepmother. Both Marvin and Lori would be around when Tyre was hanging out at Kris's house and provide Tyre with snacks. Tyre and Kris came up together in a community where everyone helped everyone and looked out for each other, and this included Kris's parents looking out for Tyre. Plaintiff does not know who Brandon Volker is.

Tyre and Plaintiff moved from Sacramento to Memphis in 2008, but Tyre returned to California on occasion to live with his dad. From 2015-2020, Tyre lived in California as an adult. Tyre stayed based in Sacramento until 2020 when he moved back to Memphis to live with

his mother. During the time that he returned to Sacramento, Tyre would visit the Volkerts. Plaintiff is unsure if Tyre ever paid rent to stay in the Volker's garage during this time, but may have. Tyre stayed at other friends' houses as well. When Tyre was diagnosed with Crohn's disease, the Volkerts helped to take care of him. Tyre and Kris remained good friends.

Dated: August 22, 2024

Respectfully Submitted,

/s/ Bhavani Raveendran

ROMANUCCI & BLANDIN, LLC

Antonio Romanucci (*pro hac vice*)

(Illinois ARDC No. 6190290)

Bhavani Raveendran (*pro hac vice*)

(Illinois ARDC No. 6309968)

Sarah Raisch (*pro hac vice*)

(Illinois ARDC No. 6305374)

Sam Harton (*pro hac vice*)

Chicago, Illinois 60654

Tel: (312) 458-1000

Fax: (312) 458-1004

Email: aromanucci@rblaw.net

Email: b.raveendran@rblaw.net

Email: sraisch@rblaw.net

Email: sharton@rblaw.net

MENDELSON LAW FIRM

David Mendelson

(Tennessee Bar No. 016812)

Benjamin Wachtel

(Tennessee Bar No. 037986)

799 Estate Place

Memphis, Tennessee 38187

Tel: (901) 763-2500 ext. 103

Fax: (901) 763-2525

Email: dm@mendelsonfirm.com

Email: bwachtel@mendelsonfirm.com

BEN CRUMP LAW

Ben Crump (*pro hac vice pending*)

(Washington, D.C. Bar No. 1552623)

(Tennessee Bar No. 038054)

Chris O'Neal (*pro hac vice pending*)

(Florida Bar No. 910201)

Brooke Cluse

(Texas Bar No. 24123034)

717 D Street N.W., Suite 310
Washington, D.C. 20004
Email: ben@bencrump.com
Email: chris@bencrump.com
Email: brooke@bencrump.com

COUNCIL & ASSOCIATES, LLC

Lashonda Council Rogers
(Georgia Bar No. 190276)
50 Hunt Plaza, SE Suite 740
Atlanta, Georgia 30303
Tel: (404) 526-8857
Fax: (404) 478-8423
Email: lrogers@thecouncilfirm.com

EARNESTINE HUNT DORSE

Earnestine Hunt Dorse
(Tennessee Bar No. 012126)
3268 N Waynoka Circle
Memphis, Tennessee 38111-3616
Tel: (901) 604-8866
Email: ehdorse@gmail.com

CERTIFICATE OF SERVICE

I, Eva Dickey, hereby certify that on August 22, 2024, I served all Counsel of Record listed on the ECF System for this action via email.

s/ Eva Dickey